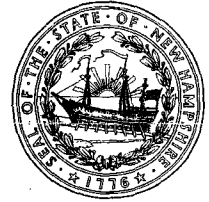




The State of New Hampshire  
**Department of Environmental Services**



**Michael P. Nolin**  
Commissioner

Mr. Frank Nappa  
Camp Gondalow YMCA  
Tuttle Lane  
Greenland, New Hampshire 03840

LETTER OF DEFICIENCY  
WMB PBF 05-09  
September 1, 2005

Dear Mr. Nappa:

The Department of Environmental Services, Water Division ("DES") is required by RSA 485-A:26 to operate a program to ensure the health and safety of the public when using public bathing facilities such as pools and spas. To implement this program, DES has adopted administrative rules Env-Ws 1101-1105 to specify the design, operation, and maintenance requirements for public bathing facilities. DES reviews applications for new public bathing facilities and also inspects and tests the water in existing public bathing facilities to ensure that applicable requirements are being met.

On August 17, 2005, DES inspected the pool at the Camp Gondalow YMCA in Greenland, NH ("the Pool"). This inspection was result of a formal complaint citing water quality and safety issues.

During this inspection, the following deficiencies were noted:

1. A recommendation to close the Pool was issued on August 17, 2005. The inspection on August 17<sup>th</sup>, 2005 revealed that the Pool was in violation of Env-Ws 1103.14 and unsafe for public use. The following bacterial violations were observed in the Pool water:
  - a. Pursuant to Env-Ws 1103.14(a)(2) the maximum allowable Heterotrophic Plate Count (HPC) in public bathing facility water is five hundred colony-forming units per one milliliter (500 cfu/mL). The Pool water contained 4,600 cfu/mL.
2. Env-Ws 1103.15(c) requires a free residual chlorine concentration between 1.0 mg/L and 3.0 mg/L in public pool water. The free chlorine residual of the Outdoor Pool water was approximately 8.25 mg/L on August 17<sup>th</sup>, 2005.
3. Pursuant to Env-Ws 1103.15(e), the clarity of the pool water shall be such that the main drain is clearly visible at all times. The main drain / bottom of the Pool was not visible on August 17<sup>th</sup>, 2005
4. Env-Ws 1103.15(d) requires a pH between 7.0 and 7.8 in public pool water. The pH of the Pool water was 6.9 on August 17<sup>th</sup>, 2005.
5. Env-Ws 1104.01 requires the operator to test public bathing facility water for disinfectant residual, pH, and temperature prior to use of a public bathing facility and every 4 hours during operation, to record test results on a dated daily log sheet, and to maintain operational records for the previous twelve months and make these records available to DES and patrons of the public bathing facility upon request. No written records were available at the time of the inspection relative to the required testing of the Outdoor Pool water.
6. Env-Ws 1105.01(j) requires a rope with attached floats a ("breakpoint safety line") to be placed across public pools over the break in depth between the shallow and deep portions of the pool. A breakpoint safety line was not present in the Pool at the time of the inspection.
7. Env-Ws 1104.03(e)(1) states that the depth of water in feet shall be plainly and conspicuously marked at or above the water line on the vertical pool wall and on the top of the coping or edge of the deck or walk next to the pool. The depth of the Pool was not marked on the vertical pool wall of the Pool.
8. Env-Ws 1105.01(k)(19) requires pool filtration systems to include a flow meter. The filtration system for the Pool did not include a flow meter.

**P.O. Box 95, 29 Hazen Drive, Concord, New Hampshire 03302-0095**

Telephone: (603) 271-2457 • Fax: (603) 271-7894 • TDD Access: Relay NH 1-800-735-2964

DES Web site: [www.des.nh.gov](http://www.des.nh.gov)

9. Env-Ws 1103.05 requires shower facilities to be provided at all public bathing facilities. There is no shower at the Pool.
10. Env-Ws 1103.08 requires toilet facilities to be provided for both sexes and conveniently located for use. There are no toilets for use at the Pool.

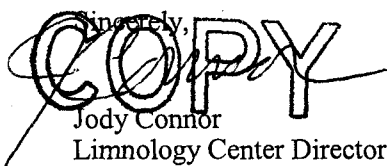
During a phone conversation, DES staff was informed that the pool was super chlorinated the day of the inspection and that the pool was in its last week of operation for the summer season. It was also noted that the free chlorine and pH were within the acceptable ranges prior to being re-opened for use.

DES believes the cited deficiencies can be corrected prior to the 2006 summer season. A report outlining how compliance will be achieved with the cited deficiencies should be submitted to DES within 30 calendar days from receipt of this letter. The report should include the following:

1. The type, manufacture, and model of the flow meter to be installed.
2. A timetable of when:
  - a. the depth will be marked vertically;
  - b. the breakpoint safety line will be installed;
  - c. the installation shower and toilet facilities will be completed; and
  - d. the installation of the flow meter will be completed.

DES personnel will conduct another inspection at a later date to determine whether you have come into, and are maintaining, full compliance with RSA 485-A:26 and Env-Ws 1101-1105. In the event that compliance is not achieved, DES may take further action, including seeking an administrative fine up to \$2,000 for each offense or referring the case to the NH Attorney General's Office for judicial action.

We appreciate your cooperation in this matter. Please contact Tim Wilson at (603) 271-7108 if you have any questions regarding this letter. Copies of Env-Ws 1101-1105 are available through the DES Public Information Center at (603) 271-2975 or via the Internet at <http://www.des.state.nh.us/pools/env1100.pdf>.

  
Jody Connor  
Limnology Center Director

Certified Mail # 7000 1670 0000 0587 7347

Enclosures

cc: Gretchen R. Hamel, Legal Unit Administrator, DES ✓  
Tim Wilson, Public Bathing Facility Coordinator, DES  
Wallace Berg, Health Officer, Town of Greenland